



Josiah Contarino
JContarino@dhillonlaw.com

July 18, 2022

VIA CF/ECF

Hon. Jessica S. Allen
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: *Jorge Lopez-Henriquez v. Diamond Foundry, Inc.*
Case No. 2:22-cv-4267-WJM-JSA**

Dear Judge Allen:

This firm represents Defendant Diamond Foundry, Inc. (“Defendant”) in the above-referenced matter. We write to request *pro hac vice* admission for Jesse D. Franklin-Murdock, Esq., an attorney from the San Francisco office of Dhillon Law Group Inc. Enclosed are copies of the following in support of this application.

1. Application for Leave to Appear and Practice Pro Hac Vice;
2. Declaration of Jesse D. Franklin-Murdock; and
3. Proposed Order.

Counsel for Plaintiff Jorge Lopez-Henriquez has advised that he consents to this Application. Accordingly, Defendant has not filed a formal motion. If this Application meets Your Honor’s approval, Defendant respectfully requests that Your Honor enter the Proposed Order and return it to the parties via CM/ECF. Thank you for the Court’s consideration of this matter.

Respectfully submitted,
DHILLON LAW GROUP, INC.

By: /s/ Josiah Contarino
Josiah Contarino

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JORGE LOPEZ-HENRIQUEZ,

Plaintiff,

V.

DIAMOND FOUNDRY, INC.,

Defendant.

Case No. 2:22-cv-4267

APPLICATION FOR LEAVE TO APPEAR AND PRACTICE PRO HAC VICE

Pursuant to Rule 101.1(c) of the Local Rules of Practice of the United States District Court for the District of New Jersey, the undersigned member in good standing of the bar of this Court hereby moves to permit Jesse D. Franklin-Murdock, Esq. to appear and practice *pro hac vice* in the above-captioned matter on behalf of Defendant Diamond Foundry, Inc. (“Defendant”).

In accordance with Local Rule 101.1(c), undersigned counsel states as follows:

1. Undersigned counsel is a member in good standing of the bar of this Court.
2. Jesse D. Franklin-Murdock, Esq. is retained counsel for Defendant. He is an associate at the law firm Dhillon Law Group Inc., which is based in San Francisco, California.
3. Mr. Franklin-Murdock has been admitted to practice law in the following states and before the following courts:

Hawaii Supreme Court (No. 10778)
Admitted 2017
Chief Clerk's Office
Aliiolani Hale
417 South King Street
Honolulu, Hawaii 96813

State Bar of California (No. 339034)
Admitted 2021
Main Office
180 Howard Street
San Francisco, CA 94105

United States District Court for the District of Hawaii
Admitted 2017
Clerk's Office
300 Ala Moana Boulevard, Room C-338
Honolulu, Hawaii 96850

United States District Court for the Northern District of California
Admitted 2022
Mark B. Busby, Clerk of Court
450 Golden Gate Avenue, 16th Floor
San Francisco, California 94102

United States District Court for the District of Columbia
Admitted 2022
Angela D. Caesar, Clerk of Court
333 Constitution Avenue N.W., Room 1225
Washington D.C. 20001

United States District Court for the Central District of California
Admitted 2022
Kiry K. Gray, District Court Executive
350 W. 1st Street, Suite 4311
Los Angeles, California 90012

United States Court of Appeals for the Ninth Circuit
Admitted 2022
Molly C. Dwyer, Clerk of Court
95 7th Street
San Francisco, California 94103

4. Mr. Franklin-Murdock has never been the subject of disciplinary proceedings in any jurisdiction, nor are any disciplinary proceedings currently pending.

5. Mr. Franklin-Murdock has never had a previous *pro hac vice* admission denied or revoked for misconduct (by this Court or others).

6. Mr. Franklin-Murdock has read and agreed to comply with the Local Rule 101.1(c) of the United States District Court for the District of New Jersey.

7. The undersigned counsel, Josiah A. Contarino, Esq., is an attorney with the law firm Dhillon Law Group Inc. in its New Jersey office, and has filed an appearance in this action.

8. A supporting declaration from Mr. Franklin-Murdock is attached to this application as Exhibit A.

WHEREFORE, Defendant Diamond Foundry, Inc., by and through undersigned counsel, respectfully requests the Court to grant leave to allow Jesse D. Franklin-Murdock, Esq. to appear and practice *pro hac vice* in the above-captioned matter before this Court.

Dated: July 18, 2022

Respectfully submitted,

DHILLON LAW GROUP, INC.
A CALIFORNIA PROFESSIONAL CORPORATION

By: /s/Josiah Contarino
JOSIAH CONTARINO

50 Park Place – Suite 1105
Newark, NJ 07102
973-298-1723
jcontarino@dhillonlaw.com
*Attorneys for Defendant
Diamond Foundry Inc.*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JORGE LOPEZ-HENRIQUEZ,

Plaintiff,

V.

DIAMOND FOUNDRY, INC.,

Defendant.

Case No. 2:22-cv-4267

**DECLARATION OF JESSE D. FRANKLIN-MURDOCK IN SUPPORT OF
APPLICATION FOR LEAVE TO APPEAR AND PRACTICE PRO HAC VICE**

I, Jesse D. Franklin-Murdock, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of eighteen (18) years, and I have personal knowledge of the matters contained in this declaration. If called to testify, I could do so competently and in conformity with the facts set forth in this declaration.

2. I make this declaration in support of the application filed by Defendant Diamond Foundry, Inc. (“Defendant”) for leave to enable me to appear and practice *pro hac vice* in the above-captioned case before this Court.

3. I am retained counsel for Defendant. I am an associate at the law firm Dhillon Law Group Inc., which is based in San Francisco, California.

4. I have been admitted to practice law in the following states and before the following courts:

//

//

Hawaii Supreme Court (No. 10778)
Admitted 2017
Chief Clerk's Office
Aliiolani Hale
417 South King Street
Honolulu, Hawaii 96813

State Bar of California (No. 339034)
Admitted 2021
Main Office
180 Howard Street
San Francisco, CA 94105

United States District Court for the District of Hawaii
Admitted 2017
Clerk's Office
300 Ala Moana Boulevard, Room C-338
Honolulu, Hawaii 96850

United States District Court for the Northern District of California
Admitted 2022
Mark B. Busby, Clerk of Court
450 Golden Gate Avenue, 16th Floor
San Francisco, California 94102

United States District Court for the District of Columbia
Admitted 2022
Angela D. Caesar, Clerk of Court
333 Constitution Avenue N.W., Room 1225
Washington D.C. 20001

United States District Court for the Central District of California
Admitted 2022
Kiry K. Gray, District Court Executive
350 W. 1st Street, Suite 4311
Los Angeles, California 90012

United States Court of Appeals for the Ninth Circuit
Admitted 2022
Molly C. Dwyer, Clerk of Court
95 7th Street
San Francisco, California 94103

5. I have never been the subject of disciplinary proceedings in any jurisdiction, nor are any disciplinary proceedings currently pending.

6. I have never had a previous *pro hac vice* admission denied or revoked for misconduct (by this Court or others).

7. I have read and agreed to comply with the Local Rule 101.1(c) of the United States District Court for the District of New Jersey.

I declare under penalty of perjury that the foregoing information is true and correct, and that this declaration was executed by me on July 18, 2022.

Dated: July 18, 2022

/s/Jesse D. Franklin-Murdock
JESSE D. FRANKLIN-MURDOCK

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JORGE LOPEZ-HENRIQUEZ,

Plaintiff,

V.

DIAMOND FOUNDRY, INC.,

Defendant.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

Case No. 2:22-cv-4267

ORDER ADMITTING COUNSEL PRO HAC VICE

THIS MATTER having come before the Court upon the Application of Defendant Diamond Foundry, Inc. (“Defendant”) for an Order granting admission *pro hac vice* to Jesse D. Franklin-Murdock, Esq., and the Court having read and reviewed the supporting papers filed in support of the requested relief; having read and reviewed all papers submitted in opposition and reply thereto, if any; and the Court having heard the arguments of counsel, if any; and good cause appearing therefor

IT IS on this _____ day of _____ 2022, **ORDERED** and **ADJUDGED** as follows:

1. ORDERED that pursuant to Local Civil Rule 101.1(c) of the United States District Court for the District of New Jersey, Jesse D. Franklin-Murdock, Esq. is hereby admitted *pro hac vice* in the above-captioned matter;

2. IT IS FURTHER ORDERED that Jesse D. Franklin-Murdock, Esq. shall:

a. Remain associated in this matter with Josiah Contarino, Esq., who is an attorney duly admitted to and in good standing with the Bars of New Jersey and the United States District Court for the District of New Jersey, or another attorney from the

New Jersey office of Dhillon Law Group Inc., who is licensed to practice in the United States District Court for the District of New Jersey;

- b. Abide by the Rules of Practice of the United States District Court for the District of New Jersey, including all disciplinary rules as set forth in Local Civil Rule 101.1, *et seq.*;
 - c. Notify the Court immediately of any matters affecting his standing at the Bar of any other Court; and
 - d. Have all pleadings, briefs, and other papers filed with the Court signed by Josiah Contarino, Esq., or another attorney from the New Jersey office of Dhillon Law Group Inc., who shall be responsible for those pleadings, briefs, and other papers and for the conduct of the admitted attorneys herein; and
- 3. IT IS FURTHER ORDERED** that Jesse D. Franklin-Murdock, Esq. shall:
- a. Make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and Local Civil Rule 101.(c)(2) for any year in which he represents a client in a matter pending before this Court; and
 - b. Make payment of \$150.00 to the Clerk, United States District Court for the District of New Jersey to appear *pro hac vice* as provided in Local Civil Rule 101.1(c)(3).
-